

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA  
LAFAYETTE DIVISION**

ENOZER TELUSME,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. 4:22-cv-21
	)	
J.B. HUNT TRANSPORT, INC. and	)	
ANDRE TERRELL,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

Defendants, Andre Terrell and J.B. Hunt Transport, Inc., by counsel, pursuant to the provisions of 28 U.S.C. §§1441(a) and 1446, hereby give notice of the removal of this cause of action from Jasper Superior Court to the United States District Court for the Northern District of Indiana, Lafayette Division, Indiana, and in support thereof, state:

1. On February 11, 2022, Plaintiff filed his Complaint for Damages and Request for Jury Trial, under Cause No. 37D01-2202-CT-000113 and styled *Enozer Telusme v. J.B. Hunt Transport, Inc., and Andre Terrell*. A true and accurate copy of the State Court Record is attached hereto as Exhibit “A”.

2. This litigation involves a motor vehicle accident which occurred on or about March 19, 2021. A true and accurate copy of Plaintiff’s Complaint is attached hereto as Exhibit “B”.

3. Defendants Andre Terrell and J.B. Hunt Transport, Inc. have received service of process with regard to this litigation.

4. Plaintiff Enozer Telusme is a resident and citizen of the State of Florida.

5. Defendant Andre Terrell is a resident and citizen of the State of Ohio.

6. Defendant J.B. Hunt Transport, Inc. is a foreign corporation incorporated and organized under the laws of the State of Georgia with its principal place of business in Lowell, Benton County, Arkansas.

7. Based on the respective citizenship of the parties in this matter, complete diversity exists in this case.

8. Prior to commencing litigation, on or about July 27, 2021, counsel for Plaintiff issued a settlement demand of \$500,000. Based on Plaintiff's settlement demand, it is clear that Plaintiff's claim well exceeds the jurisdictional limit of \$75,000, exclusive of interest and costs.

9. Therefore, based on all of the foregoing, this action is one in which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332(a) and which is removable pursuant to the provisions of 28 U.S.C. §1441(a) and 28 U.S.C. §1446.

WHEREFORE, for the foregoing reasons, Defendants, Andre Terrell and J.B. Hunt Transport, Inc., by counsel, respectfully request that the above-enumerated action, now pending against Defendants in the Jasper Superior Court, State of Indiana, be removed to the United States District Court for the Northern District of Indiana, Hammond Division at Lafayette, Indiana and for all other just and proper relief in the premises.

Respectfully submitted,

CRUSER, MITCHELL, NOVITZ, SANCHEZ,  
GASTON & ZIMET, LLP

/s/ Keith A. Gaston, Esq.

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Transport, Inc. and Andre Terrell*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of March 2022, a copy of the foregoing was  
filed electronically. Notice of this filing will be sent to the following parties by U.S.

Mail, postage pre-paid:

Kyle C. Christie, Esq.  
CHRISTIE FARRELL LEE & BELL, P.C.  
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Indianapolis, IN 46202

/s/ Keith A. Gaston, Esq.\_\_\_\_\_